

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

STATE OF ARIZONA, *et al.*,

Plaintiffs,

v.

MERRICK GARLAND,
in his official capacity as Attorney
General of the United States, *et al.*,

Defendants.

Civil Action No. 6:22-cv-01130

**STATE OF LOUISIANA'S
RESPONSES AND OBJECTIONS TO
DEFENDANTS' NOTICE OF DEPOSITION**

GENERAL STATEMENT

Particularly in view of the limited discovery authorized by the Court, Dkt. 91, Dkt. 98, Defendants noticing of 94 topics of deposition pursuant to Rule 30(b)(6) is unduly burdensome on its face. Many of the topics improperly seek discovery of information that is within the control of Defendants and/or has already been the subject of adequate discovery, including by production of definitive documents, such that a 30(b)(6) testimony would be unduly cumulative. Fed. R. Civ. P. 26(b)(2)(C); *see also, e.g., Banks v. Office of Senate Sergeant-at-Arms*, 222 F.R.D. 7, 19 (D.D.C. 2004) (“I expect the parties to find topics that will insure that the 30(b)(6) depositions are meaningful exercises in ascertaining information that has not been previously discovered By taking these depositions, plaintiff is certifying to me that he will not ask questions that duplicate questions previously asked of other witness or seek information that he already has by virtue of responses to other discovery devices.”). Louisiana further notes that Defendants are seeking testimony on, e.g., issues of law for which testimony is *per se* improper.

Louisiana is willing to meet and confer regarding appropriate topics, but it will not produce a witness on any topics until such meet and confer occurs. To the Louisiana does produce a witness, that witness’s testimony is limited to information known or reasonably available to the Office of Attorney General Jeff Landry and the Louisiana Department of Justice. Fed. R. Civ. P. 30(b)(6). Louisiana reserves the right to prove facts of which it has little or no knowledge via expert testimony. Further, in making objections, Louisiana expressly reserves the right to seek a protective order on any topic(s) or Defendants’ Notice *in toto*.

OBJECTIONS TO DEFINITIONS

1. The State of Louisiana, by and through Attorney General Jeff Landry (“Louisiana”) objects to the definition of “You” and “your” to the extent it refers to any entity outside control of the Office of the Attorney General or the Louisiana Department of Justice. *See Biden v. Nebraska*, 143 S.Ct. 2355, 2365-

68 2386-88 (2023) (holding that State had standing to assert injury to instrumentality notwithstanding instrumentality's refusal to cooperate with litigation); *see also, e.g., S.E.C. v. Collector's Coffee, Inc.*, 337 F.R.D. 70 (S.D.N.Y. 2020), *objections overruled*, 2021 WL 391298 (S.D.N.Y. 2021); *Sicav v. Wang*, 2014 WL 2624753 (S.D.N.Y. June 12, 2014).

4. Louisiana objects to the definition of "Relating to" as rendering any topic insufficiently specific.

OBJECTION TO INSTRUCTIONS

Louisiana objects to any and all instructions to the extent they purport to impose obligations beyond the Federal Rules of Civil Procedure and applicable law.

OBJECTIONS TO SPECIFIC TOPICS FOR EXAMINATION

State of Louisiana

Topic S1

The number of Aslyees who have established residence in the State.

Response to Topic S1

Louisiana objects to this topic as unreasonably cumulative or duplicative of discovery that has already been taken, and further objects to this topic as seeking information that is already in Defendants' possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will produce a witness on Topic 1.

Topic S2

The number of Applicants for Admission paroled by the federal government at the Southwest border pending their applications for asylum or their removal proceedings who have established residence in the State.

Response to Topic S2

Louisiana objects to this topic as unreasonably cumulative or duplicative of discovery that has already been taken, and further objects to this topic as seeking information that is already in Defendants' possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will produce a witness on Topic 2.

Topic S3

The number of Undocumented Immigrants who have established residence in the State.

Response to Topic S3

Louisiana objects to this topic as unreasonably cumulative or duplicative of discovery that has already been taken, and further objects to this topic as seeking information that is already in Defendants' possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will produce a witness on Topic 3.

Topic S4

Evidentiary support for the statement in the Second Amended Complaint, ECF No. 86, ¶ 2, that the "Asylum IFR makes it substantially easier for unauthorized economic migrants to enter the United States and obtain asylum through false claims."

Response to Topic S4

Louisiana objects to this topic as unreasonably cumulative or duplicative of discovery that has already

been taken, and further objects to this topic as seeking information that is already in Defendants' possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will produce a witness on Topic 4

Topic S5

Evidentiary support for the statement in the Second Amended Complaint, ECF No. 86, ¶ 3, that “[t]he entirely predictable result [of the Asylum IFR] will be a substantial increase in the approval rate of non-meritorious asylum claims.”

Response to Topic S5

Louisiana will produce a witness on Topic 5.

Topic S6

Evidentiary support for the statement in the Plaintiffs' motion for preliminary injunction, ECF No. 22-1, pg. 12, that asylum officers “have an infamously lax track record.”

Response to Topic S6

Louisiana will produce a witness on Topic 6.

Topic S7

Evidentiary support for the statement in the Second Amended Complaint, ECF No. 86, ¶ 3, that an “increase in approval rates [of asylum claims] will incentivize even higher rates of illegal immigration into the United States.”

Response to Topic S7

Louisiana objects to this topic as unreasonably cumulative or duplicative of discovery that has already been taken, and further objects to this topic as seeking information that is already in Defendants' possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will produce a witness on Topic 7.

Topic S8

The yearly income, sales, and property tax revenue collected by the State from Applicants for Admission paroled by the federal government at the Southwest border pending their applications for asylum or their removal proceedings.

Response to Topic S8

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), and outside the limited scope of discovery

authorized by the Court. Subject to the foregoing objections, Louisiana will produce a witness on Topic 8.

Topic S9

The yearly income, sales, and property tax revenue collected by the State from asylees.

Response to Topic S9

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will produce a witness on Topic 9.

Topic S10

Information regarding what “state budget and resource allocations” have been made based on existing regulations governing the expedited removal process, as alleged in the Second Amended Complaint, ECF No. 86, ¶ 181 and Plaintiffs’ preliminary injunction at 28 (“States’ budgets and resource allocations are determined in reliance on Defendants’ continued enforcement of immigration law.”)

Response to Topic S10

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), and outside the limited scope of discovery authorized by the Court, particularly to the extent it seeks discovery of information beyond Medicaid, education, and TANF/SNAP. Subject to the foregoing objections, Louisiana will produce a witness on Topic 10 with respect to Medicaid, education, and TANF/SNAP.

Topic S11

The economic impact to the State and businesses within the State of labor shortages.

Response to Topic S11

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 11.

Topic S12

The methods and means of calculating the data requested in any of these topics.

Response to Topic S12

Louisiana incorporates its objections and responses to the respective topics. Subject to the foregoing objections, Louisiana will produce a witness on Topic 12 to the same extent it produces a witness on any underlying Topic.

Topic S13

The number of Applicants for Admission, noncitizens, and Undocumented Immigrants who resided in Louisiana, and have moved out of the State.

Response to Topic S13

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), and outside the limited scope of discovery authorized by the Court. Louisiana further objects to this topic as seeking information that is already in Defendants' possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 13.

Topic S14

Evidentiary support for the statement in the paragraph 81 of the Second Amended Complaint, ECF No. 86, and in the memorandum of understanding referenced therein, that Louisiana "is directly and concretely affected by changes to DHS rules and policies that have the effect of easing, relaxing, or limiting immigration enforcement. Such changes can negatively impact [Louisiana's] law enforcement needs and budgets, as well as its other important health, safety, and pecuniary interests of the State of Arizona."

Response to Topic S14

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Louisiana objects to this topic as cumulative in seeking an evidentiary basis for Defendants' admissions. Subject to the foregoing objections, Louisiana will produce a witness on Topic 14.

Topic S15

Evidentiary support for the claim made in the Second Amended Complaint, ECF No. 86, ¶ 80, that "the Asylum IFR will create increased crime and drug trafficking in Louisiana's communities."

Response to Topic S15

Louisiana objects to this Topic as unduly burdensome and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 15.

Topic S16

Evidentiary support for the statement in the Second Amended Complaint, ECF No. 86, ¶ 83, that “DHS ‘paroles’ many illegal immigrants into Louisiana cities without even the minimal security of a bond.”

Response to Topic S16

Louisiana objects to this topic as unreasonably cumulative or duplicative of discovery that has already been taken, and further objects to this topic as seeking information that is already in Defendants’ possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will produce a witness on Topic 16.¹

Topic S17

The total number of individuals in the State who have been convicted for drug trafficking.

Response to Topic S17

Louisiana objects to this Topic as unduly burdensome and outside the limited scope of discovery authorized by the Court. Louisiana objects to this topic as vague and ambiguous in that “drug trafficking” does not identify a specific crime. To the extent Defendants are referencing federal convictions, Louisiana further objects to this topic as seeking information that is already in Defendants’ possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 17.

Topic S18

The number of Applicants for Admission paroled by the federal government at the Southwest border pending their applications for asylum or their removal proceedings who have been convicted for drug trafficking.

Response to Topic S18

Louisiana objects to this Topic as unduly burdensome and outside the limited scope of discovery authorized by the Court. Louisiana objects to this topic as vague and ambiguous because it does not identify a specific crime. Louisiana objects to this Topic as requiring information Defendants have refused to provide. Louisiana further objects to this topic as seeking information that is already in Defendants’ possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 18.

Topic S19

The number of Asylees in the State who were convicted for drug trafficking.

¹ See, e.g., <https://www.cbp.gov/newsroom/local-media-release/new-orleans-border-patrol-arrests-ms-13-gang-member> (“The other three illegal aliens were released in Louisiana on their own recognizance, pending asylum court cases.”)

Response to Topic S19

Louisiana objects to this Topic as unduly burdensome and outside the limited scope of discovery authorized by the Court. Louisiana objects to this topic as vague and ambiguous because it does not identify a specific crime. Louisiana objects to this Topic as requiring information Defendants have refused to provide. Louisiana further to this topic as seeking information that is already in Defendants' possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 19.

Topic S20

The number of Undocumented Immigrants in the States who were convicted for drug trafficking.

Response to Topic S20

Louisiana objects to this Topic as unduly burdensome and outside the limited scope of discovery authorized by the Court. Louisiana objects to this topic as vague and ambiguous because "drug trafficking" does not identify a specific crime. Louisiana further objects to this topic as seeking information that is already in Defendants' possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Louisiana objects to this Topic as requiring information Defendants have refused to provide. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 20.

Topic S21

Evidentiary support for the statement in the Second Amended Complaint, ECF No. 86, at ¶ 140, that "[t]he increased number of illegal aliens in the Plaintiff States will thus also increase crime and criminal justice expenses in Plaintiff States."

Response to Topic S21

Louisiana objects to this Topic as unduly burdensome and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 21.

Topic S22

The nature and cost of the "general government services" the State of Louisiana provides to noncitizens, as claimed in the Second Amended Complaint, ECF No. 86, at ¶ 80.

Response to Topic S22

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on

Topic 22.

Topic S23

For Topic No. 22, whether and how those costs have changed since March 29, 2022.

Response to Topic S23

I.

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 22.

Department of Children and Family Services

Topic C1

The structure of Louisiana's Department of Children and Family Services, including but not limited to, the roles, duties, and responsibilities of your attorneys, employees, agents, representatives, and other affiliates.

Response to Topic C1

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 1.

Topic C2

Each service offered by the Department of Children and Family Services, including the number of individuals and/or families who seek, receive, and/or require such services.

Response to Topic C2

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. To the extent this topic does seek relevant information, it is cumulative of existing discovery. *See* 2023.07.27 DCFS Production – Asylee Issuance Amount Spreadsheet. Subject to the foregoing objections, Louisiana produce a witness on the authenticity of documents it produced.

Topic C3

For each of those services, the eligibility requirements.

Response to Topic C3

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and

education. To the extent this topic does seek relevant information, it is unreasonably cumulative of existing discovery, *see* 2023.07.27 DCFS Production – SNAP Eligibility Requirement_Non-Citizen Status, and is already in Defendants’ control, *i.e.*, a source that is more convenient, less burdensome, and less expensive.² Subject to the foregoing objections, Louisiana will produce a witness on the authenticity of the documents it produced.

Topic C4

The cost of providing such services, broken down by individuals, family, and/or service.

Response to Topic C4

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. To the extent this topic does seek relevant information, it is cumulative of existing discovery. *See* 2023.07.27 DCFS Production – Asylee Issuance Amount Spreadsheet; LADOJ-ASYLUM3588 (2023 La. Act 447). Subject to the foregoing objections, Louisiana will produce a witness to authenticate the documents it produced.

Topic C 5

Whether and to what extent your department has policies or practices pertaining to provision of services specifically to noncitizen residents of Louisiana.

Response to Topic C5

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. To the extent this topic does seek relevant information, it is cumulative of existing discovery. *See* 2023.07.27 DCFS Production – SNAP Eligibility Requirement_Non-Citizen Status Subject to the foregoing objections, Louisiana will provide a witness on the authenticity of the policy documents that it produced.

Topic C6

The number of Applicants for Admission released by the federal government pending their applications for asylum or their removal proceedings who seek, receive, and/or require services by the Department of Children and Family Services.

Response to Topic C6

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. To the extent this topic does seek relevant information, it is cumulative of existing discovery. *See* 2023.07.27 DCFS Production – Asylee Issuance Amount Spreadsheet. Subject to the foregoing objections, Louisiana will produce a witness on this topic.

²<https://www.fns.usda.gov/snap/eligibility/citizen/non-citizen-policy>

Topic C7

The number of Undocumented Immigrants who seek, receive, and/or require services by the Department of Children and Family Services.

Response to Topic C7

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. Louisiana objects to this Topic as unreasonably cumulative of existing discovery, and seeking information that is already in Defendants' control, *i.e.*, a source that is more convenient, less burdensome, and less expensive.³ Subject to the foregoing objections, Louisiana will not produce a witness on Topic 7.

Topic C8

The number of Asylees who seek, receive, and/or require services by the Department of Children and Family Services.

Response to Topic C8

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. Louisiana objects to this Topic as unreasonably cumulative of existing discovery. *See* 2023.07.27 DCFS Production – Asylee Issuance Amount Spreadsheet. Subject to the foregoing objections, Louisiana produce a witness on the authenticity of the documents it has produced.

Topic C9

How the statuses of and services utilized by the above groups are determined, tracked, collected, and/or reviewed by the Department of Children and Family Services.

Response to Topic C9

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. Louisiana objects to this Topic as unreasonably cumulative of existing discovery. *See* 2023.07.27 DCFS Production – B-0220-SNAP Eligibility Requirement_Non-Citizen Status. Subject to the foregoing objections, Louisiana produce a witness on the authenticity of the documents it has produced.

Topic C10

The amount and type of funding or financial assistance you receive from the federal government, local

³ <https://www.fns.usda.gov/snap/recipient/eligibility> (“SNAP eligibility has never been extended to undocumented non-citizens.”); <https://crsreports.congress.gov/product/pdf/RI/RI.33809> (“Nonimmigrants and unauthorized aliens are ineligible for SNAP, SSI, and TANF.”).

governments, and/or other sources of funding for the purposes of providing these services.

Response to Topic C10

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), overbroad, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. Louisiana further objects to this topic as unduly cumulative of discovery already produced, LADOJ-ASYLUM3588 (2023 La. Act 447), and seeking information that is already in Defendants' control, *i.e.*, a source that is more convenient, less burdensome, and less expensive.⁴ Subject to the foregoing objections, Louisiana will produce a witness on the authenticity of documents it has produced.

Topic C11

If and how that funding changes based on your provision of services to noncitizens.

Response to Topic C11

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), overbroad, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. Louisiana further objects to this topic as unduly cumulative of discovery already produced, LADOJ-ASYLUM3588 (2023 La. Act 447), and seeking information that is already in Defendants' control, *i.e.*, a source that is more convenient, less burdensome, and less expensive.⁵ Subject to the foregoing objections, Louisiana will not produce a witness on Topic 11.

Topic C12

If and how you determine whether individuals and/or families receiving assistance from your department are citizens or noncitizens, and for the latter group, their immigration status.

Response to Topic C12

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. Louisiana objects to this Topic as unreasonably cumulative of existing discovery. *See* 2023.07.27 DCFS Production – B-0220-SNAP Eligibility Requirement_Non-Citizen Status. Subject to the foregoing objections, Louisiana produce a witness on the authenticity of the documents it has produced.

Topic C13

⁴ <https://www.ncbi.nlm.nih.gov/books/NBK206907/> (“Program costs for SNAP are almost entirely in the form of benefits and are covered by the federal government, the exception being for a small portion of administrative expenses paid for by state governments.”)

⁵ <https://www.ncbi.nlm.nih.gov/books/NBK206907/> (“Program costs for SNAP are almost entirely in the form of benefits and are covered by the federal government, the exception being for a small portion of administrative expenses paid for by state governments.”)

For Topic No. 11, how the immigration status of individuals and/or families is maintained and in what format, who has access to that information, whether that information is shared in any way with non-governmental individuals, groups, and/or local governments, and for what purpose.

Response to Topic C13

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. Louisiana objects to this Topic as unreasonably cumulative of existing discovery. *See* 2023.07.27 DCFS Production – B-0220-SNAP Eligibility Requirement_Non-Citizen Status. Subject to the foregoing objections, Louisiana produce a witness on the authenticity of the documents it has produced.

Topic C 14

How the provision of services to noncitizens, both those lawfully present (under a particular immigration status, parole, or while pursuing relief from removal) and/or those present without authorization, impacts the amount you spend on those services and the type and extent of services you provide.

Response to Topic C14

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. Subject to the foregoing objections, Louisiana will produce a witness on Topic 14.

Topic C15

Whether and to what degree there have been any changes in the cost or type of services stated in Topic No. 13 since March 29, 2022, and how you came to this conclusion.

Response to Topic C15

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. Subject to the foregoing objections, Louisiana will produce a witness on Topic 15.

Topic C16

The number of unaccompanied minors released under the Asylum IFR who were resettled in the State of Louisiana, the services provided to them by the Department of Children and Families, and the cost of those services.

Response to Topic C16

Louisiana objects to this Topic as unduly burdensome, overbroad, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. Louisiana further objects to this topic as seeking information that is

already in Defendants' possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 16.

Topic C17

Evidentiary support for the statement in your motion for preliminary injunction, ECF No. 22-1, at 17, that the "Asylum IFR ...will also incentivize human trafficking for sexual exploitation."

Response to Topic C17

Louisiana objects to this Topic as unduly burdensome, overbroad, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 17.

Topic C18

The number of Applicants for Admission paroled by the federal government at the Southwest border pending their applications for asylum or their removal proceedings who have been convicted of human trafficking in the State.

Response to Topic C18

Louisiana objects to this Topic as unduly burdensome, overbroad, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. Louisiana objects to this topic as vague and ambiguous because "human trafficking" does not identify a specific crime. Louisiana further objects to this topic as seeking information that is already in Defendants' possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will produce a witness on Topic 18.

Topic C19

The number of Undocumented Immigrants who have been convicted of human trafficking in the State.

Response to Topic C19

Louisiana objects to this Topic as unduly burdensome, overbroad, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. Louisiana objects to this topic as vague and ambiguous because it does not identify a specific crime. Louisiana further objects to this topic as seeking information that is already in Defendants' possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 19.

Topic C20

The number of Asylees who have been convicted of human trafficking in the State.

Response to Topic 20

Louisiana objects to this Topic as unduly burdensome, overbroad, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. Louisiana objects to this topic as vague and ambiguous because it does not identify a specific crime. Louisiana further objects to this topic as seeking information that is already in Defendants' possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 20.

Topic C21

The percentage of the State's overall budget that is spent by your agency generally on services for noncitizens, and specifically on services for Applicants for Admission released by the federal government pending their applications for asylum or their removal proceedings and Asylees.

Response to Topic C21

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Uzuegbunam v. Preczewski*, 141 S. Ct. 792, 800-01 (2021); *Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 22.

Topic C22

The percentage of the State's budget for your agency that is fixed versus that which is contingent on changes in circumstances, including changes in demand for the services you provide, and whether any funds allocated for your agency not used within the budgetary year are diverted to other programs or expenditures.

Response to Topic C22

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Uzuegbunam v. Preczewski*, 141 S. Ct. 792, 800-01 (2021); *Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 22.

Department of Education

Topic E1

The structure of Louisiana's Department of Education, including but not limited to, the roles, duties, and responsibilities of your attorneys, employees, agents, representatives, and other affiliates.

Response to Topic E1

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 1.

Topic E2

The number of individuals enrolled in public schools in the State of Louisiana.

Response to Topic E2

Louisiana objects to this Topic as cumulative of discovery already provided. *See* LDOE – feb-2023-multi-stats spreadsheet. Subject to the foregoing objection, Louisiana will produce a witness on the authenticity of the documents it has produced.

Topic E3

The number of Applicants for Admission paroled by the federal government at the Southwest border pending their applications for asylum or their removal proceedings enrolled in public schools in the State of Louisiana.

Response to Topic E3

Louisiana objects to this topic as requiring information Defendants have refused to provide. Subject to the foregoing objection, Louisiana will produce a witness on Topic 3.

Topic E4

The number of Undocumented Immigrants enrolled in public schools in the State of Louisiana.

Response to Topic E4

Louisiana will produce a witness on Topic 4.

Topic E5

The number of Asylees enrolled in public schools in the State of Louisiana.

Response to Topic E5

Louisiana will produce a witness on Topic .5

Topic E6

How the statuses of and services utilized by the above groups are determined, tracked, collected, and/or reviewed by the Department of Education.

Response to Topic E6

Louisiana will produce a witness on Topic 6.

Topic E7

The types of services provided to children enrolled in public school in the State of Louisiana.

Response to Topic E7

Louisiana objects to this topic as overbroad, unduly burdensome, and beyond the limit scope of discovery authorized by the Court. Louisiana further objects to this topic as vague and ambiguous with respect to “types of services.” Subject to the foregoing objections, Louisiana will produce a witness overseeing Louisiana’s Minimum Foundation Program.

Topic E8

The cost of providing services provided to children enrolled in public school, broken down by child and/or service.

Response to Topic E8

Louisiana objects to this topic as overbroad, unduly burdensome, beyond the limit scope of discovery authorized by the Court, and unduly cumulative of discovery already provided. *See, e.g.*, LDOE mfp-2023----24-transmittal letter; LDOE – fy2023-24-mfp-budget-letter_projection_bese-adopted. Louisiana further objects to this topic as vague and ambiguous with respect to “types of services.” Subject to the foregoing objections, Louisiana will produce a witness overseeing Louisiana’s Minimum Foundation Program in response to Topic 8.

Topic E9

The amount and type of funding or financial assistance you receive from the federal government, local governments, and/or other sources of funding for the purposes of assisting in or supporting public education.

Response to Topic E9

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), and outside the limited scope of discovery authorized by the Court. Louisiana further objects to this topic as unreasonably cumulative and duplicative of existing discovery, LADOJ-ASYLUM3588 (2023 La. Act 447), LDOE-Information needed for lawsuit discovery request May 2023 spreadsheet, and is already in Defendants’ position, *i.e.*, available from another source that is more convenient, less burdensome, and less expensive. Subject to the foregoing objections, Louisiana will provide a witness on the authenticity of the documents it has produced.

Topic E10

If and how that funding changes based on your provision of public education services to noncitizens.

Response to Topic E10

Louisiana objects to this topic as overbroad, unduly burdensome, beyond the limit scope of discovery authorized by the Court, and unduly cumulative of discovery already provided. Louisiana further objects to this topic as vague and ambiguous with respect to “that funding.” Subject to the foregoing objections, Louisiana will produce a witness overseeing Louisiana’s Minimum Foundation Program in response to Topic 10.

Topic E11

If and how you determine whether individuals receiving Louisiana public education are citizens or noncitizens, and for the latter group, their immigration status.

Response to Topic E11

Louisiana objects to this Topic as unduly burdensome and cumulative of discovery already provided. Subject to the foregoing objections, Louisiana will produce a witness on Topic 11.

Topic E12

For Topic No. 11, how the immigration status of students is maintained and in what format, who has access to that information, whether that information is shared in any way with non-governmental individuals, groups, and/or local governments, and for what purpose.

Response to Topic E12

Louisiana objects to this topic as overbroad, unduly burdensome, beyond the limit scope of discovery authorized by the Court, and unduly cumulative of discovery already provided. Louisiana further objects to this topic as seeking irrelevant information, particularly with regard to “who has access to that information, whether the information is shared in any way with non-governmental individuals, groups, and/or local governments, and for what purpose.” Subject to the foregoing objections, Louisiana will not produce a witness for Topic 12.

Topic E13

How the provision of educational services to noncitizens, both those lawfully present (under a particular immigration status, parole, or while pursuing relief from removal) and/or those present without authorization, impacts the amount you spend on those services and the type and extent of services you provide.

Response to Topic E13

Louisiana objects to this topic as overbroad, unduly burdensome, beyond the limit scope of discovery authorized by the Court, and unduly cumulative of discovery already provided. Louisiana further objects to this topic as vague and ambiguous with respect to “that funding.” Subject to the foregoing objections, Louisiana will produce a witness overseeing Louisiana’s Minimum Foundation Program in

response to Topic 13.

Topic E14

Whether and to what degree there have been any changes in the cost or type of services stated in Topic No. 13 since March 29, 2022, and how you came to this conclusion.

Response to Topic E14

Louisiana objects to this topic as overbroad, unduly burdensome, and beyond the limit scope of discovery authorized by the Court. Louisiana further objects to this topic as vague and ambiguous with respect to “services.” Subject to the foregoing objections, Louisiana will produce a witness overseeing Louisiana’s Minimum Foundation Program in response to Topic 14.

Topic E15

The percentage of the State’s overall budget that is spent by your agency generally on services for noncitizens, and specifically on services for Applicants for Admission released by the federal government pending their applications for asylum or their removal proceedings and Asylees.

Response to Topic E15

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Uznegbunam v. Preczenski*, 141 S. Ct. 792, 800-01 (2021); *Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), and outside the limited scope of discovery authorized by the Court. Louisiana objects to this topic as requiring information Defendants have refused to provide. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 15.

Topic E16

The percentage of the State’s budget for your agency that is fixed versus that which is contingent on changes in circumstances, including changes in demand for the services you provide, and whether any funds allocated for your agency not used within the budgetary year are diverted to other programs or expenditures.

Response to Topic E16

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Uznegbunam v. Preczenski*, 141 S. Ct. 792, 800-01 (2021); *Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will produce a witness overseeing Louisiana’s Minimum Foundation Program in response to Topic 16.

Department of Health

Topic H1

The structure of Louisiana's Department of Health, including but not limited to, the roles, duties, and responsibilities of your attorneys, employees, agents, representatives, and other affiliates.

Response to Topic H1

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 1.

Topic H2

Each service offered by the Department of Health, including the number of individuals who seek, receive, and/or require such services.

Response to Topic H2

Louisiana objects to this Topic as unduly burdensome, overbroad, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. To the extent relevant information is sought, Louisiana further objects to this topic as seeking information that is unreasonably cumulative and duplicative of information already produced in a more convenient, less burdensome, and less expensive form. *See* LDH-2, LDH-3, LDH-4. Louisiana objects to this topic as vague and ambiguous in referring to services "offered" by LDH. Subject to the foregoing objections, Louisiana will produce a witness on this topic.

Topic H3

The cost of providing such services, broken down by individual and/or service.

Response to Topic H3

Louisiana objects to this Topic as unduly burdensome, overbroad, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. To the extent relevant information is sought, Louisiana further objects to this topic as seeking information that is unreasonably cumulative and duplicative of information already produced in a more convenient, less burdensome, and less expensive form. LDH-2, LDH-3, LDH-4. Subject to the foregoing objections, Louisiana will produce a witness on the provision of Medicaid and Emergency Medical Services.

Topic H4

The number of noncitizens who seek, receive, and/or require services by the Department of Health.

Response to Topic H4

Louisiana objects to this Topic as unduly burdensome, overbroad, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid,

TANF/SNAP, and education. To the extent relevant information is sought, Louisiana further objects to this topic as seeking information that is unreasonably cumulative and duplicative of information already produced in a more convenient, less burdensome, and less expensive form. LDH-2, LDH-3, LDH-4. Louisiana objects to this topic as seeking information that is already in Defendants' possession, *i.e.*, in a more convenient, less burdensome, and less expensive form. Subject to the foregoing objections, Louisiana will produce a witness on the number of aliens who receive Medicaid or Emergency Medical Services.

Topic H5

Whether and to what extent your department has policies or practices pertaining to provision of services specifically to noncitizen residents of Louisiana.

Response to Topic H5

Louisiana objects to this Topic as unduly burdensome, overbroad, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. To the extent relevant information is sought, Louisiana further objects to this topic as seeking information that is unreasonably cumulative and duplicative of information already produced in a more convenient, less burdensome, and less expensive form. *See, e.g.*, LDH-Issued Revisions 2023 folder. Subject to the foregoing objections, Louisiana will produce a witness to authenticate the policies it has produced.

Topic H6

The number of Applicants for Admission released by the federal government pending their applications for asylum or their removal proceedings who seek, receive, and/or require services by the Department of Health.

Response to Topic H6

Louisiana objects to this Topic as unduly burdensome, overbroad, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. To the extent relevant information is sought, Louisiana further objects to this topic as seeking information that is unreasonably cumulative and duplicative of information already produced in a more convenient, less burdensome, and less expensive form. *See* LDH-2, LDH-3, LDH-4. Louisiana objects to this topic as seeking information that is already in Defendants' possession, *i.e.*, in a more convenient, less burdensome, and less expensive form. Subject to the foregoing objections, Louisiana will produce a witness to authenticate the documents it has produced.

Topic H7

The number of Undocumented Immigrants who seek, receive, and/or require services by the Department of Health.

Response to Topic H7

Louisiana objects to this Topic as unduly burdensome, overbroad, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. To the extent relevant information is sought, Louisiana further objects to this topic as seeking information that is unreasonably cumulative and duplicative of information already produced in a more convenient, less burdensome, and less expensive form. *See* LDH-2, LDH-

3, LDH-4. Louisiana objects to this topic as seeking information that is already in Defendants' possession, *i.e.*, in a more convenient, less burdensome, and less expensive form. Subject to the foregoing objections, Louisiana will produce a witness on this topic.

Topic H8

The number of Asylees who seek, receive, and/or require services by the Department of Health.

Response to Topic H8 Louisiana objects to this Topic as unduly burdensome, overbroad, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. To the extent relevant information is sought, Louisiana further objects to this topic as seeking information that is unreasonably cumulative and duplicative of information already produced in a more convenient, less burdensome, and less expensive form. *See* LDH-2, LDH-3, LDH-4. Subject to the foregoing objections, Louisiana will produce a witness on this topic.

Topic H9

How the statuses of and services utilized by the above groups are determined, tracked, collected, and/or reviewed by the Department of Health.

Response to Topic H9

Louisiana objects to this Topic as unduly burdensome, overbroad, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. To the extent relevant information is sought, Louisiana further objects to this topic as seeking information that is unreasonably cumulative and duplicative of information already produced in a more convenient, less burdensome, and less expensive form. *See, e.g.*, LDH-Issued Revisions 2023 folder.⁶ Subject to the foregoing objections, Louisiana will produce a witness to authenticate the policies previously produced.

Topic H10

The amount and type of funding or financial assistance you receive from the federal government, local governments, and/or other sources of funding for the purposes of providing these services.

Response to Topic H10

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), overbroad, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. Louisiana further objects to this topic as unduly cumulative of discovery already produced. *See* LDH-1; LADOJ-ASYLUM3588 (2023 La. Act 447). Louisiana further objects to this topic as seeking discovery that is already in Defendants' possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will produce a witness on Topic 10.

Topic H11

If and how that funding changes based on your provision of services to noncitizens.

⁶ <https://ldh.la.gov/assets/medicaid/MedicaidEligibilityPolicy/I-300.PDF>

Response to Topic H11

Louisiana objects to this topic as overbroad, unduly burdensome, beyond the limit scope of discovery authorized by the Court, and unduly cumulative of discovery already provided. Louisiana further objects to this topic as vague and ambiguous with respect to “that funding.” Louisiana further objects to this topic as seeking discovery that is already in Defendants’ possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will produce a witness on Topic H11.

Topic H12

If and how you determine whether individuals receiving assistance from your agency are citizens or noncitizens, and for the latter group, their immigration status.

Response to Topic H12

Louisiana objects to this topic as overbroad, unduly burdensome, and unduly cumulative of discovery already provided. *See, e.g.*, LDH-Issued Revisions 2023 folder.⁷ Subject to the foregoing objections, Louisiana will produce a witness to authenticate the policies it produced.

Topic H13

For Topic No. 12, how the immigration status of individuals is maintained and in what format, who has access to that information, whether that information is shared in any way with non-governmental individuals, groups, and/or local governments, and for what purpose.

Response to Topic H13

Louisiana objects to this Topic as unduly burdensome, overbroad, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court, which is limited to Medicaid, TANF/SNAP, and education. Louisiana objects to this topic as vague and ambiguous with respect to “maintained” and “format”. Subject to the foregoing objections, Louisiana will produce a witness to authenticate the documents it produced.

Topic H14

How the provision of services to noncitizens, both those lawfully present (under a particular immigration status, parole, or while pursuing relief from removal) and/or those present without authorization, impacts the amount you spend on those services and the type and extent of services you provide.

Response to Topic H14

Louisiana objects to this topic as overbroad, unduly burdensome, beyond the limit scope of discovery authorized by the Court, and unduly cumulative of discovery already provided. *See* LDH-1, LDH-2, LDH-3, LDH-4. Louisiana further objects to this topic as vague and ambiguous with respect to “that funding.” Louisiana further objects to this topic as seeking information that is already in Defendants’ possession, *i.e.*, a more convenient, less burdensome, and less expensive source. Subject to the foregoing objections, Louisiana will produce a witness to authenticate the policies and data it has produced.

⁷ <https://ldh.la.gov/assets/medicaid/MedicaidEligibilityPolicy/I-300.PDF>

Topic H15

Whether and to what degree there have been any changes in the cost or type of services stated in Topic No. 12 since March 29, 2022, and how you came to this conclusion.

Response to Topic H15

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), and outside the limited scope of discovery authorized by the Court. Louisiana objects to this topic as overbroad, unduly burdensome, beyond the limit scope of discovery authorized by the Court, and unduly cumulative of discovery already provided. *See* LDH-1, LDH-2, LDH-3, LDH-4. Subject to the foregoing objection, Louisiana will produce a witness on this topic.

Topic H16

The percentage of the State's overall budget that is spent by your agency generally on services for noncitizens, and specifically on services for Applicants for Admission released by the federal government pending their applications for asylum or their removal proceedings and Asylees.

Response to Topic H16

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Uzegebum v. Preczewski*, 141 S. Ct. 792, 800-01 (2021); *Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), and outside the limited scope of discovery authorized by the Court. Louisiana objects to this topic as requiring information Defendants have refused to provide. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 16.

Topic H17

The percentage of the State's budget for your agency that is fixed versus that which is contingent on changes in circumstances, including changes in demand for the services you provide, and whether any funds allocated for your agency not used within the budgetary year are diverted to other programs or expenditures.

Response to Topic H17

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, *see Uzegebum v. Preczewski*, 141 S. Ct. 792, 800-01 (2021); *Texas v. United States*, 809 F.3d 134, 155-56 (5th Cir. 2015), and outside the limited scope of discovery authorized by the Court. Louisiana objects to this topic as requiring information Defendants have refused to provide. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 15.

Department of Public Safety and Corrections

Topic P1

The structure of Louisiana's Department of Public Safety and Corrections, including but not limited to, the roles, duties, and responsibilities of your attorneys, employees, agents, representatives, and other affiliates.

Response to Topic P1

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 1.

Topic P2

The number of individuals incarcerated or otherwise detained in prisons operated or overseen by the Department of Public Safety and Corrections.

Response to Topic P2

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 3.

Topic P3

The number of noncitizens incarcerated or otherwise detained in prisons operated or overseen by the Department of Public Safety and Corrections.

Response to Topic P3

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 3.

Topic P4

Whether and to what extent your department has policies or practices pertaining to provision of services specifically to noncitizen inmates.

Response to Topic P4

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 4.

Topic P5

The number of applicants for admission released by the federal government at the Southwest border pending their application for asylum or their removal proceedings incarcerated or otherwise detained in prisons operated or overseen by the Department of Public Safety and Corrections.

Response to Topic P5

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 5.

Topic P6

How the statuses of and services utilized by the above groups are determined, tracked, collected, and/or reviewed by the Department of Public Safety and Corrections.

Response to Topic P6

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 6.

Topic P7

The types of services provided to individuals incarcerated or otherwise detained in prisons operated or overseen by the Department of Public Safety and Corrections.

Response to Topic P7

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 7.

Topic P8

The cost of providing services to individuals incarcerated or otherwise detained in prisons operated or overseen by the Department of Public Safety and Corrections, broken down by inmate and/or service.

Response to Topic P8

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 8.

Topic P9

The amount and type of funding or financial assistance you receive from the federal government, local governments, and/or other sources of funding for the purposes of assisting in or supporting prisons operated or overseen by the Department of Public Safety and Corrections.

Response to Topic P9

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Louisiana objects to this topic as cumulative of discovery already provided. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 9.

Topic P10

If and how that funding changes based on your provision of services to noncitizen inmates or detainees.

Response to Topic P10

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 10.

Topic P11

If and how you determine whether inmates or detainees are citizens or noncitizens, and for the latter group, their immigration status.

Response to Topic P11

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 11.

Topic P12

For Topic No. 11, how the immigration status of inmates or detainees is maintained and in what format, who has access to that information, whether that information is shared in any way with non-governmental individuals, groups, and/or local governments, and for what purpose.

Response to Topic P12

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 12.

Topic P13

How the provision of inmate or detention services to noncitizens, both those lawfully present (under a particular immigration status, parole, or while pursuing relief from removal) and/or those present without authorization, impacts the amount you spend on those services and the type and extent of services you provide.

Response to Topic P13

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 13.

Topic P14

Whether and to what degree there have been any changes in the cost or type of services stated in Topic No. 13 since March 29, 2022, and how you came to this conclusion.

Response to Topic P14

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 14.

Topic P15

The percentage of the State's overall budget that is spent by your agency generally on detention of, or services for, noncitizens, and specifically on services for Applicants for Admission released by the federal government pending their applications for asylum or their removal proceedings and Asylees.

Response to Topic P15

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 15.

Topic P16

The percentage of the State's budget for your agency that is fixed versus that which is contingent on changes in circumstances, including changes in demand for the services you provide, and whether any funds allocated for your agency not used within the budgetary year are diverted to other programs or expenditures.

Response to Topic P16

Louisiana objects to this Topic as unduly burdensome, seeking irrelevant information, and outside the limited scope of discovery authorized by the Court. Subject to the foregoing objections, Louisiana will not produce a witness on Topic 16.

Dated: September 18, 2023

/s/ Joseph S. St. John
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